

Sealed

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United States Courts
Southern District of Texas
FILED

April 08, 2025

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

[REDACTED]

JOSE ENRIQUE MARTINEZ FLORES
aka Chuqui

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§

Criminal No. 4:25-cr-00030-S1

SEALED
SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
(International Cocaine Distribution Conspiracy)

Beginning in May 2024, the exact date being unknown to the Grand Jury, and continuing thereafter until the return of this Indictment, in the countries of Colombia, Venezuela and within the extraterritorial jurisdiction of the United States of America, the defendants

[REDACTED]

and

JOSE ENRIQUE MARTINEZ FLORES
aka Chuqui

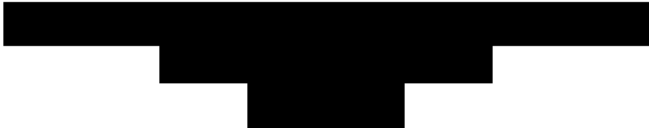
did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jury to manufacture and distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States of America.

In violation of Title 21, United States Code, Sections 963, 959(a), 960(a)(3) and 960 (b)(1)(B).

COUNT TWO

(International Cocaine Distribution)

On or about November 6, 2024, in the country of Colombia and within the extraterritorial jurisdiction of the United States of America, defendants


and
JOSE ENRIQUE MARTINEZ FLORES
aka Chuqui


did knowingly and intentionally manufacture and distribute a controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States of America. The controlled substance involved was more than 5 kilograms, that is, approximately 10 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 959(a), 960(a)(3), 960(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT THREE

(Providing Material Support to a Foreign Terrorist Organization Conspiracy)

From on or about February 20, 2025, and continuing thereafter until the return of this Indictment, in the Southern District of Texas, and elsewhere including the countries of Colombia and Venezuela within the extraterritorial jurisdiction of the United States of America, the defendants


and
JOSE ENRIQUE MARTINEZ FLORES
aka Chuqui

and others known and unknown to the Grand Jury did conspire to provide “material support or

resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), namely, personnel (including themselves) and services, to a foreign terrorist organization namely, Tren de Aragua (“TdA”), which at all relevant times was designated by the United States Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that TdA was a designated foreign terrorist organization, and that TdA engages and has engaged in terrorist activity, and that TdA engages and has engaged in terrorism.

In violation of Title 18, United States Code, Section 2339B.

COUNT FOUR

(Providing and Attempting to Provide Material Support to a Foreign Terrorist Organization)

From on or about February 20, 2025, and continuing thereafter until the return of this Indictment, in the Southern District of Texas, and elsewhere including the countries of Colombia and Venezuela within the extraterritorial jurisdiction of the United States of America, the defendants

[REDACTED]

and


JOSE ENRIQUE MARTINEZ FLORES
aka Chuqui

provided and attempted to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), namely, personnel (including themselves) and services, to a foreign terrorist organization namely, TdA, which at all relevant times was designated by the United States Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that TdA was a designated foreign terrorist organization, and that TdA engages and has engaged in terrorist activity, and that TdA engages and has engaged in terrorism.

In violation of Title 18, United States Code, Sections 2339B and 2.

COUNT FIVE
(International Cocaine Distribution)

On or about March 5, 2025, in the countries of Colombia, Venezuela and within the extraterritorial jurisdiction of the United States of America, the defendants


and
JOSE ENRIQUE MARTINEZ FLORES
aka Chuqui

did knowingly and intentionally manufacture and distribute a controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States of America. The controlled substance involved was more than 5 kilograms, that is, approximately 14 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 959(a), 960(a)(3), 960(b)(1)(B), and Title 18, United States Code, Section 2.

A TRUE BILL

Original Signature on File

FOREPERSON

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